

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO ALL CASES IN WAVE 3 OF MDL 200	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**NOTICE OF OBJECTION TO AMENDED NOTICE OF TAKING DEPOSITION OF
JERRY BLAIVAS, M.D.**

Defendants object to Plaintiffs' Amended Notice of Taking Deposition of Jerry Blaivas, M.D. on all MUS products dated and filed on August 29, 2016 for a deposition to occur on the same day, August 29, 2016, on the following grounds: (1) said notice is untimely under Rule 30 of the Federal Rules of Civil Procedure, and (2) said amended notice seeks to amend a notice that Plaintiffs did not file.

August 30, 2016

By: /s/ Tracy J. Van Steenburgh
Tracy J. Van Steenburgh
NILAN JOHNSON LEWIS PA
120 South Sixth Street, Suite 400
Minneapolis, MN 55402
Telephone: 612-305-7500
Facsimile: 612-305-7501
Email: tv@nilanjohnson.com

**Attorneys for Defendant Ethicon, Inc. and
Johnson & Johnson**

CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

s/ Tracy J. Van Steenburgh